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April 8, 2019

VIA EMAIL EX PARTE

Honorable Vernon Broderick
United States District Court
Southern District of New York
New York, New York 10007

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 4/8/2019

Re: United States v. Saipov, 17 Cr. 722(VSB)

Dear Judge Broderick:

I write to ask that you appoint David Ruhnke as second learned counsel for Mr. Saipov.

The Court previously appointed Mr. Ruhnke as learned counsel on a limited basis to deal with a Bureau of Prisons-related matter as to which David Stern, our primary learned counsel, was conflicted. However, as we have been preparing for trial and a death penalty phase proceeding, Mr. Ruhnke has become quite valuable to us in our preparations. He is one of the most experienced federal capital litigators in the country, and in a case such as Mr. Saipov's, with its many complicated issues, his experience is nearly impossible to replace. The Southern District of New York CJA Plan permits the appointment of additional counsel, and it is common in authorized death penalty cases to appoint more than one learned counsel. For example, in the Boston Marathon Bombing case, two learned counsel were appointed to join the Federal Defender office in representing Mr. Tsarnaev.

If Your Honor would like a more detailed explanation for the basis for this request, I would be happy to provide one.

Respectfully submitted,

/s
David E. Patton
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